

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
STACEY JEAN HOWINGTON aka	:	20-12356 ELF
STACEY HOWINGTON aka STACEY	:	
J HOWINGTON	:	
Debtor	:	CHAPTER 13

DEBTORS ANSWER TO MOTION OF QUICKEN LOANS, LLC
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Debtor has attempted to pay the mortgage each and every month from the first month following the filing of this bankruptcy through the most recent month and Movant has never accepted any of Debtors attempted payments. Debtor has held the monies owed for her monthly mortgage payment separate and apart from her regular bills and stands ready and able to pay the arrears in full.
7. Denied. While Debtor is not contesting that Movant may or may not have incurred legal fees it is the position of the Debtor that any and all fees have been incurred because of Movants bad faith or at least dismal customer service. Debtor has tried to tender payment each and every month to the Movant mortgage company but has been denied any avenues through which to make payment. Debtor has now incurred additional attorney's fees defending this motion which is in front of this Court

entirely from the actions of the Movant who has not accepted any of the timely offered payments from the debtor and now wishes to be able to take action against the property of the debtor and subvert one of the main purposes of the Chapter 13 bankruptcy code. Respondent suggests Debtor should not be saddled with paying the Movants bill to boot.

8. Admitted.
9. Denied.
10. This is a statement of law to which no answer is required.

WHEREFORE, respondent prays this honorable Court deny this motion and award Respondent reasonable attorneys fees.

/s/ Everett Cook
Everett Cook, Esquire
1605 N. Cedar Crest Blvd.
Suite 520
Allentown, PA 18104
Ph: 610-351-3566
Attorney for Debtor Respondent